Case 1:22-cr-00557-JPC Document 8 Filed 10/19/22 Page 1 of 1

Federal Defenders OF NEW YORK, INC.

Southern District 52 Duane Street-10th Floor, New York, NY 10007 Tel: (212) 417-8700 Fax: (212) 571-0392

David E. Patton Executive Director and Attorney-in-Chief Southern District of New York Jennifer L. Brown Attorney-in-Charge

October 18, 2022

BY ECF & EMAIL

Honorable John P. Cronan United States District Judge Southern District of New York 500 Pearl Street, Room 1320 New York, NY 10007

Re: <u>United States v. Rodney Waggoner</u>

22-CR-557 (JPC)

Dear Judge Cronan:

I write to respectfully request that the Court modify Mr. Waggoner's bail conditions to eliminate the requirement that his bond be co-signed by a third financially responsible person. Neither the government nor Pretrial Services object to this request.

On September 30, 2022, Magistrate Judge James L. Cott ordered Mr. Waggoner released on his own signature and several additional bail conditions, including *inter alia* a \$100,000 personal recognizance bond to be co-signed by three financially responsible people by October 14, 2022, home incarceration, and location monitoring.

Mr. Waggoner has successfully obtained two financially co-signers — his partner and his mother. However, he is having difficulty locating a third. As two co-signers are already approved, and Pretrial Services confirms Mr. Waggoner is in compliance with all his other bail conditions, including home incarceration enforced through location monitoring, we respectfully request that the Court remove the condition that his bond be co-signed by a third financially responsible person. As noted above, the government and Pretrial Services consent to this request.

Sincerely,

<u>/s/ Hannah McCrea</u> Hannah McCrea Assistant Federal Defender (646) 574-0351

CC: AUSA Ryan Finkel USPSO Ashley Cosme

The request is granted. It will suffice for Mr. Waggoner's bond to be co-signed by the two financially responsible persons whose sigantures he has already obtained; a third financially responsible person need not co-sign his bond.

SO ORDERED Date: October 19, 2022 New York, New York

JOHN P. CRONAN United States District Judge